



San Francisco Bay Regional Water Quality Control Board

May 7, 2012

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U.S. Department of the Navy
Attn: Mr. Keith Forman
BRAC Program Management Office – West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
Via email only: keith.s.forman@navy.mil

Subject: Agency Comments on the *Draft Work Plan, Time-Critical Removal Action for the Experimental Ship Shielding Range, Parcel E-2 Hunters Point Naval Shipyard San Francisco, California, April 18, 2012*

Dear Mr. Forman,

I have reviewed the subject document, and have the following comments:

- 1) **4.2.3 Release Criteria for ROCs:** We understand the Navy proposes to revise the release criterion for Cobalt-60 in excavated soil to 0.252 pCi/g, and has discussed this proposal with regulatory agencies, including the California Department of Public Health. However, as of the date of this letter, documentation of regulatory concurrence from the agencies on this issue has not been made available. Therefore, we note that this issue is still pending. The proposed criterion is inconsistent with the remediation goals for Cobalt-60 presented in the draft Record of Decision for Parcel E-2, which are 0.0602 pCi/g (outdoor worker) and 0.0361 pCi/g (resident).
- 2) **5.14 Backfill Placement and Compaction:** Given the pending status of the release criterion for Cobalt-60 in excavated soil, please clarify that soil excavated as part of this removal action will not be used as backfill outside the footprint of the Shielding Range and investigation zone.
- 3) **Definition of “hot spot”:** Section 5.13 Final Conditions Survey of Experimental Ship Shielding Range states the objective of the final conditions survey is to “demonstrate that the identified residual radioactivity levels are below the release criteria for the Shielding Range location.” The section later states “If at final depth of excavation, areas of elevated residual radioactivity (i.e., hot spots) are identified, the areas will be documented and reported to the Navy and RASO.” Elevated activity is defined in Section 4.3.3 Remedial Action Support Survey as measurements greater than three standard deviations above the reference area mean. In the document, please clarify the definition of “hot spot”, as well as the radioactivity levels that will be documented and reported during the final conditions survey. Does the term “hot spot” refer to locations exceeding release criteria, or to locations with radiation levels greater than three standard deviations above the reference area mean, as suggested in sections 4.3.3 and 5.13? If only areas of elevated activity, as defined in section 4.3.3, are reported, it

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- 2 -

is not clear that the final conditions survey will demonstrate that residual radioactivity levels are below the release criteria.

- 4) **17.2 Pre-Excavation Waste Characterization Soil Sampling:** This section states that the California Waste Extraction Test and EPA Method 6010B, and the Toxicity Characteristic Leaching Procedure (by EPA Methods 1311/6010B) will be performed to determine leachable concentrations if necessary. Please clarify how the analyses will be determined to be necessary.
- 5) **17.7. Stormwater Monitoring (SWPP, Appendix C to the Work Plan):** This section states that if stormwater sampling becomes necessary, "...the sample may be analyzed for some or all of the following: ROCs, TPH-purgeable, TPH-extractable, TSS, Turbidity, pH." Please revise this section to clarify that stormwater samples will be analyzed for all of these parameters unless justification is provided as to why a particular analysis can be excluded.

Please contact me at (510) 622-5682 or email tlow@waterboards.ca.gov with any questions.

Sincerely,



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by Tina Low
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Tina Low, P.E.
Water Resources Control Engineer
Groundwater Protection Division

Cc (via email only):

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